

c) REMARKS

The claims are 1-9 with claims 1, 5 and 9 being independent.

The Examiner initially objected to the drawings on the ground that the specification mentioned sign 106 which was not present in the drawings. To resolve this issue, the specification was then amended to delete mention of reference numeral 106. In the outstanding action the Examiner requested reintroduction of reference character 106 and amendment of the drawings to include reference character 106.

In order to expedite prosecution the specification has been amended to reintroduce character 106 and a Request for Approval of Drawing Changes has been filed herewith requesting approval of the proposed amendments to Figs. 1 and 14.

At page 43, lines 17-19 of the specification, it was disclosed that "reference numeral 106 indicates a cathode electrode which is provided at the discharge electrode 105" with reference to Fig. 1. Also at page 48, lines 2-4 of the specification, it was disclosed that "reference numeral 106 indicates a cathode electrode which is provided at the discharge electrode 105" with reference to Fig. 14.

The Examiner previously indicated that the sentence "reference numeral 106 indicates a cathode electrode which is provided at the discharge electrode 105" is ambiguous because reference numeral 106 was not present in Fig. 1 and Fig. 14.

The sentence "reference numeral 106 indicates a cathode electrode" is not completely accurate. The specification has now been amended to read --reference numeral 106 indicates a guard electrode.--

Guard electrode 106 corresponds to the feature shown in the attached copies of proposed amended Figs. 1 and 14.

This is apparent by referring to the priority documents Japanese Patent Application 2000-332832 (filed October 31, 2000) and Japanese Patent Application 2000-332383 (filed October 31, 2000) made of record in the Claim to Priority paper dated January 11, 2002. In Fig. 1 of JPA 2000-332382 and JPA 2000-332383 numeral 106 is present (see enclosed copies).

Guard electrode 106 is electrically connected to the wall of film-forming vessel 101 which is shown and disclosed to be electrically grounded. Therefore, guard electrode 106 is likewise electrically grounded. Discharge electrode 105 has electrical continuity with guard electrode 106, such that discharge electrode 105 is also electrically grounded.

Accordingly, discharge electrode 105 serves as the cathode electrode. Substrate 102, which serves as a counter electrode to discharge electrode 105, serves as the anode electrode.

Wherefore, none of the references, whether alone or combined, discloses or suggests the present claimed invention nor renders it unpatentable.

It is requested that the claims be reconsidered, the case allowed and the application passed to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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